

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**MICHAEL T. DREHER, for himself and on
behalf of all similarly situated individuals,**

Plaintiffs,

v.

**EXPERIAN INFORMATION
SOLUTIONS, INC.,**

Defendant.

CASE NO. 3:11-cv-00624-JAG

JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER

Plaintiff Michael Dreher and Defendant Experian Information Solutions, Inc.

(“Experian”), through their respective attorneys of record, respectfully request that the Court enter the accompanying Stipulated Protective Order (attached as Exhibit 1) to facilitate document disclosure and production in this matter and to protect the parties’ confidential proprietary and/or business information.

Dated: November 9, 2012

/s/ Leonard A. Bennett
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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of November, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing to the following:

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